

1 **JORGE A. RAMIREZ, ESQ.**

Nevada Bar No. 6787

2 **ELLEN S. BOWMAN, ESQ.**

Nevada Bar No. 12118

3 **WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

4 300 South Fourth Street, 11th Floor

Las Vegas, NV 89101

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6 Jorge.Ramirez@wilsonelser.com

Ellen.Bowman@wilsonelser.com

7 *Attorneys for Defendant Jennifer Hogan*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 THOMAS DUBE, as Parent and Legal Guardian of
11 JORDAN DUBE, a minor,

12 Plaintiff,

vs.

13 JENNIFER HOGAN; WESTERN UNITED
14 INSURANCE COMPANY dba AAA NEVADA
15 INSURANCE COMPANY; and DOES 1 through
10, and ROE ENTITIES 11 through 20, inclusive

16 Defendants.

Case No.: 2:14-CV-00495- JCM-VCF

**STIPULATION AND ORDER TO
REMAND**

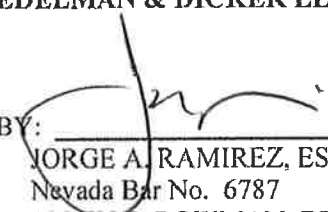
17 IT IS HEREBY STIPULATED by and between Richard A. Harris, Esq. and Samantha A.
18 Martin, Esq. of the RICHARD HARRIS LAW FIRM, attorneys for Plaintiff, THOMAS DUBE, as
19 Parent and Legal Guardian of JORDAN DUBE (hereinafter "Plaintiff"), and Jorge Ramirez, Esq.
20 and Ellen Bowman, Esq. of WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP,
21 attorneys for Defendant JENNIFER HOGAN (hereinafter "Defendant"), that as the total value of
22 damages in this action does not exceed this Court's required amount of SEVENTY-FIVE
23 THOUSAND DOLLARS and NO CENTS (\$75,000.00) necessary to maintain subject matter
24 jurisdiction in this court, this case shall be REMANDED to the Eighth Judicial District Court of
25 Clark County, Nevada for all further proceedings.
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1 IT IS FURTHER STIPULATED between the parties that the total amount of damages which
2 Plaintiff seeks to recover in this action will not exceed SEVENTY-FIVE THOUSAND DOLLARS
3 (\$75,000.00).

4 IT IS FURTHER STIPULATED that Plaintiff WAIVES any right to collectively recover any
5 monies above and beyond SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00) in this action
6 against Defendant, resulting from the incident that occurred on August 1, 2012.

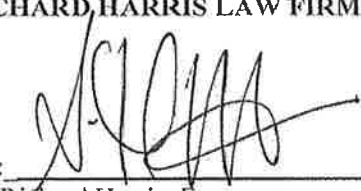
7 DATED this 10th December day of ~~September~~, 2014.

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9 **WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

10
11 BY: 
12 **JORGE A. RAMIREZ, ESQ.**
13 Nevada Bar No. 6787
14 **ELLEN S. BOWMAN, ESQ.**
15 Nevada Bar No. 12118
16 300 South Fourth Street, 11th Floor
17 Las Vegas, NV 89101
18 Attorneys for Defendant Jennifer Hogan

30th
DATED this 30th day of ~~September~~, 2014. December

RICHARD HARRIS LAW FIRM

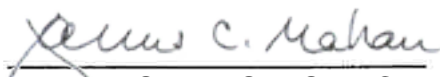
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28 BY: 
Richard Harris, Esq.
Nevada Bar No. 505
Samantha Martin
Nevada Bar No. 12998
801 South Fourth Street
Las Vegas, NV 89101
Attorneys for Plaintiff Thomas Dube, as
parent and legal guardian of Jordan Dube

ORDER

IT IS HEREBY ORDERED that, as the value of this case does not exceed the jurisdictional limits of this Court, this case is REMANDED to the Eighth Judicial District Court of Clark County, Nevada for all future proceedings, pursuant to the terms stipulated by the parties set forth herein.

IT IS FURTHER HEREBY ORDERED that pursuant to the agreement of the parties, the maximum amount of damages which Plaintiff may recover in this matter is limited to SEVENTY-FIVE THOUSAND DOLLARS and NO CENTS (\$75,000.00).

DATED December 12, 2014.


UNITED STATES DISTRICT JUDGE

Prepared and Respectfully Submitted by:

**WILSON, ELSE, MOSKOWITZ, EDELMAN
& DICKER LLP**

BY: 

JORGE A. RAMIREZ, ESQ.

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